

NOV 19 2003

Mississippi Children's Home Services

Compassionate Solutions for Children & FamiliesSM



November 13, 2003

Administration

1900 North West Street, Suite D
Jackson, MS 39202
(601) 352-7784
(601) 960-0021 (Fax)

Adoption/Maternity Services**

1500 North West Street, Suite A
Jackson, MS 39202
(601) 352-7784
(601) 960-4349 (Fax)

ARIC*

Alcohol & Drug Services

1801 North West Street
Jackson, MS 39202
(601) 352-0077
(601) 352-3703 (Fax)

CARES Center*

Psychiatric Residential Treatment

402 Wesley Avenue
Jackson, MS 39202
(601) 360-0583
(601) 360-0583 (Fax)

CARES School & School Day Program*

Jackson Campus

402 Wesley Avenue
Jackson, MS 39202
(601) 360-0583
(601) 360-0583 (Fax)

CARES School Day Program*

East Campus

Box 401
MS 39524
(601) 863-3548
(601) 863-3548 (Fax)

Consumer Credit Counseling Services**

1900 North West Street, Suite A
Jackson, MS 39202
(601) 352-7784
(601) 960-0028 (Fax)

Intensive In-Home Services*

28281 Road 401
Sauder, MS 39574
(228) 862-4992
(228) 862-3348 (Fax)

Powers*

Transitional Therapeutic Group Home

P.O. Box 1078
Jackson, MS 39213
(601) 372-9408
(601) 346-0956 (Fax)

RAP Team**

Prevention & Education Services

1801 North West Street
Jackson, MS 39202
(601) 352-7784
(601) 352-3703 (Fax)

South Mississippi Children's Center**

P.O. Box 646
Hattiesburg, MS 39403
(601) 582-8891
(601) 582-8896 (Fax)

Therapeutic Foster Care Services*

28281 Road 401
Sauder, MS 39574
(228) 862-4992
(228) 862-3548 (Fax)

County Children's Shelter**

Box 120174
Jackson, MS 39218
(601) 654-0640
(601) 654-0724 (Fax)

U.S. Department of State, CA/OCS/PRI
Adoption Regulations Docket Room
SA-29
2201 C Street, N.W.
Washington, DC 20520

Re: State/AR-01/96 and
State/AR-01/98

To Whom It May Concern:

I am writing on behalf of Mississippi Children's Home Services, which operates a small sized adoption program that has been in existence since 1912. I am writing to express concern regarding the proposed Hague Convention standards and what they may mean for our agency's, as well as other small agencies', ability to participate in intercountry adoptions.

I am particularly concerned regarding what appears to have been a lack of communication with licensed adoption agencies and adoptive parent advocacy groups in the United States in writing these standards. This lack of communication has contributed to a sense of panic and speculation amongst these parties.

The following questions and concerns are noted:

1. The Accrediting Entity discussed in the proposed standards is not identified. Will The Hague Convention serve as their own Accrediting Entity or will an external accrediting body be identified? There has been much discussion regarding the Council on Accreditation (COA) being named as the sole accrediting body for the Hague Convention. This is concerning to small agencies when the fact that a former COA executive served as a principal author of the proposed standards. COA accreditation is a gold standard for agency excellence, but is also very expensive to achieve and maintain. Our agency has been COA accredited for twenty (20) years; however, we have recently considered dropping the accreditation. Primary factors influencing this decision are cost (up to \$50,000 annually to maintain) and the fact that



Joint Commission
An Accreditor of Health Care Organizations

*A Service of CARES Center, Inc., an affiliate of the Mississippi Children's Home Society

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our agency has other accountability and credentialing mechanisms in place. Our agency is licensed by our state Department of Human Services and is also accredited by the Joint Commission on Accreditation of Healthcare Organizations (JCAHO).

2. The requirement of a \$1,000,000 insurance policy per adoption seems thorough and protective in nature, but impractical in practice. Our Agency has contacted our insurance carrier who reported that our current insurance underwriter nor any other underwriter with whom he has experience would be willing to underwrite such a policy. Provided an underwriter could be located, the cost would be prohibitive and would directly increase the cost per adoption. In addition, with such a significant insurance policy in place it seems that frivolous lawsuits would be inevitable.

I anxiously await the State Department's response to my expressed concerns and questions. I hope that consideration will be given to the voice of small agencies and adoptive parent advocacy groups.

Sincerely,



Susan Davis-Penick, LPC
Corporate Compliance Officer